



P E R F E C T W A L L

**Anti-discrimination
And anti-mobbing
policy
of CreoConcept
Sp. z o.o. Sp. k.**





In accordance with the applicable non-discrimination and anti-mobbing regulations, the Management Board of CreoConcept Sp. z o.o. Sp. k. shall effectively counteract discrimination and bullying and effectively resolve any existing problems of unequal treatment, mobbing, harassment and sexual harassment in the workplace.

1. Policy purpose and scope

1.1 This Policy aims to set out the principles for countering mobbing and discrimination to shape a friendly and safe working environment that ensures the dignified and equal treatment of colleagues and business partners. It also aims to introduce effective and efficient rules and solutions that prevent misconduct.

1.2 This Policy outlines the following:

- definitions of discriminatory conduct and mobbing;
- measures preventing incidents of workplace mobbing and discrimination;
- rules for handling discrimination and mobbing;
- how Employees can report unlawful conduct;
- report processing procedure;
- consequences facing the bullies.

1.3 All Employees are required to read and strictly adhere to the contents of this Policy.

2. Definitions and forms of infringement

2.1 Mobbing shall mean any actions or conduct concerning or directed against an Employee which consists in persistent and prolonged harassment or intimidation of said Employee. Mobbing occurs when such actions or conduct cause an Employee to have a low opinion of their professional suitability, humiliate or ridicule the Employee, intend to do so, or otherwise isolate or exclude the Employee from the company staff. Persistent and prolonged shall mean that actions and conduct are **recurring, repeated and systematic.**

Mobbing may also be passive.

There is no specific catalogue of the offender's conduct that could be interpreted as mobbing. Each bully acts differently and may engage in mobbing in an unexpected way. Mobbing can also consist of a combination of different behaviours by the offender.

Learn more: Labour Code (Art. 94. Employer's duty to prevent mobbing).

2.2 Actions and conduct constituting mobbing shall include, individually or in combination, in particular:

- limiting or obstructing the opportunity to speak, constant interruptions;
- verbal aggression, i.e. shouting, insulting, intimidating, using slurs, humiliation;
- attacks of a professional or private nature, i.e. undermining confidence, ridicule, mockery;
- non-verbal aggression, e.g. demeaning and provocative gestures;
- taking away or questioning decision-making authority, unjustified de-tasking, excessive control and unreasonable criticism;
- assigning work that is contradictory, incompatible with the Employee's competencies and undermines the Employee's dignity;
- hindering or denying access to the means and materials needed to perform duties or deliberately placing them in a physically remote or isolated location;
- making false assessments about job commitment, quality of work and professional competencies;
- isolation, unjustified avoidance of contact, exclusion from the group, lack of or blocked opportunities to talk to the Employee, concealment of relevant information;
- aiming to eliminate the victim from the company staff.

2.3 Discrimination shall mean the unequal treatment of Employees with regard to the establishment of their employment relationship, terms and conditions of employment, promotion and access to training for the development of their professional qualifications, and in particular without regard to their gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination or sexual orientation, as well as due to employment for a definite or indefinite term or on a full-time or part-time basis.

Learn more: Labour Code (Article 18(3a). — [Non-discrimination — definitions]).

2.4 Actions and conduct that constitute discrimination shall include:

- unfavourable remuneration for work or other terms and conditions of employment;
- omission for promotion or other work-related benefits;
- omission for selection for professional qualification training.

2.5 Conduct described in 2.2 and relating directly or indirectly to terms and conditions of employment, promotion and access to skills training opportunities, particularly based on gender, age, disability, race, religion, nationality, political opinions, union membership, ethnic origin, religion, sexual orientation, as well as employment type and working hours, may also be deemed mobbing.

2.6 Reasonable, rational and constructive information, including criticism of an Employee's actions or conduct or reasonable instructions given to them in the course of their work, shall not constitute mobbing.





3. General rules of conduct

3.1 At CreoConcept Sp. z o.o. Sp.k., no discriminatory actions, mobbing or other conduct that undermines the dignity and esteem of another human being shall be tolerated.

3.2 Any action or conduct that may be deemed discriminatory or a form of mobbing under the Labour Code shall be strictly prohibited.

3.3 Exploiting a privileged professional position in an unjustified and unlawful manner shall be prohibited.

3.4 Each Employee shall be obliged to respond to any observed instances of discrimination or mobbing.

3.5 Any discriminatory conduct and mobbing shall be deemed unlawful and in breach of the internal regulations of CreoConcept Sp. z o.o. Sp. k., including the Code of Business Conduct and Ethics.

4. Preventing and addressing workplace discrimination and mobbing

4.1 Obligations of the Employer

- The relationship between the Employees and the Employer shall be based on compliance with the obligations under labour legislation, respect for personal dignity and tolerance towards the Employee;
- The Employer shall not tolerate sexual, physical or psychological harassment of Employees or offensive language;
- In decisions relating to Employees, particularly with regard to employment, promotion, skills training opportunities and remuneration, the Employer shall be guided by an objective assessment of the Employees' performance, skills and competencies, as well as professional experience;
- Employee assessment criteria shall be formulated in a clear and verifiable manner;
- The Employer shall not discriminate against Employees based on race, religion, nationality, colour, age, gender, marital status, sexual orientation, ethnic origin, disability, political opinions, union membership, as well as employment type and working hours;
- The Employer shall take preventive action aimed at the elimination and early detection of misconduct.
- The Employer shall take steps to inform the Employees about the standards and ethical principles governing the functioning of CreoConcept Sp. z o.o. Sp. k.;
- The Employer shall support Employees suffering any misconduct by Colleagues or Business Partners.

4.2 The Employer shall prevent mobbing and discrimination, particularly by:

- introducing methods and mechanisms to reveal and eliminate unacceptable conduct;
- monitoring the incidence of reported misconduct;
- responding whenever discrimination or mobbing is suspected, regardless of the source of the information;
- remedying the effects of discrimination and mobbing through the available legal measures, particularly by assisting victims of misconduct.

4.3 The Employer shall use the available sanctioning measures against perpetrators of discrimination and mobbing in accordance with the law.

4.4 Discrimination and mobbing prevention tasks shall be entrusted to department heads.

4.5 Obligations of the Employee

- Employees shall treat other Employees and Colleagues equally;
- any disputes and conflicts shall be resolved without violating the personal dignity of the parties involved;
- Employees shall never use their authority or information obtained in the course of their work for purposes other than those for which such authority or information was provided;
- Any Employee who suffers or witnesses discrimination or mobbing shall promptly report it

5. Rules for handling discrimination and mobbing

5.1 An Employee's exercise of their rights for breach of the principle of equal treatment in Employment shall not be the basis for unfavourable treatment of the Employee at the workplace, nor may it result in any negative consequences towards the Employee.

5.2 Discrimination or mobbing may be reported by submitting a complaint in accordance with the Whistleblowing Policy described below.

5.3 Reports may be filed anonymously or openly through the following channels:

- sending an e-mail to zaufanie@gmail.com;
- placing an anonymous message describing the issue in the box located in the corridor at the hall entrance (next to the changing rooms and the notice board).
- making an in-person report to the designated person.

5.4 The report shall contain:

- a) a description of the situation
- b) evidence and/or witnesses to the incident (if possible)
- c) name(s) of the offender(s)
- d) report date





5.5 In the case of an in-person report, the reporting person shall be asked to sign a statement confirming the information provided in the report upon its acceptance.

5.6 The report review and investigation procedure shall be carried out in line with the above Policy and shall include:

- hearing the position of the reporting person;
- hearing the position of the Employee identified as the offender in the report, examining possible evidence and hearing from witnesses;
- investigating to verify the information obtained during Employee interviews.

5.7 The work of the team examining the report shall be confidential.

5.8 According to the law, the Employer may apply the following sanctions to those guilty of discrimination or mobbing:

- revising the offender's employment;
- terminating the offender's employment;
- holding the offender liable to disciplinary action for misconduct.

5.9 Making false accusations of mobbing shall be prohibited. Employees who intentionally and deliberately make false accusations of discriminatory conduct or mobbing may also be held liable by the Employer.

6. Final provisions

6.1 The Employer may provide training on applying this Policy, and Employees shall be required to participate in it.

6.2 All Company Employees shall read this Policy.



Anti-discrimination and anti-mobbing policy of CreoConcept Sp. z o.o. Sp. k. was adopted in 2019, and updated on July 1, 2024.
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